

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

J-SQUARED TECHNOLOGIES, INC., a Canadian)
corporation, and J-SQUARE TECHNOLOGIES)
(OREGON) INC., an Oregon corporation,)
Plaintiffs,)
v.) C.A. No. 04-CV-960-SLR
MOTOROLA, INC., a Delaware corporation.)
Defendant.)

**MOTOROLA'S SUPPLEMENTAL RESPONSE
TO PLAINTIFFS' MOTION TO COMPEL**

In their Reply Brief, Plaintiffs for the first time allege that "Motorola instruct[ed] its witnesses not to respond to questions eliciting factual information concerning performance under the Agreements." (Reply p. 11 ¶27). In response to this assertion, Motorola asks that the record include the following exhibits:

Exhibit 21: Excerpts from deposition transcript of Mr. Dennis Robinson regarding performance beginning at: p. 72:15; p. 109:1; p. 214:7; and p. 326:22.

Exhibit 22: Motorola's Response to JSO Interrogatory Nos. 1, 2, 3, 4, and 5 regarding performance, and Motorola's Supplemental Response to JSO Interrogatory Nos. 1, 2, and 3 regarding performance.

Exhibit 23: Deposition Exhibit 73 regarding performance produced by Motorola.

YOUNG CONAWAY STARGATT & TAYLOR, LLP
/s/ William W. Bowser

William W. Bowser (Bar I.D. 2239)
The Brandywine Building, 17th Floor
1000 West Street
Wilmington, Delaware 19801
wbowser@ycst.com

OF COUNSEL: Randy Papetti, Richard A. Halloran,
Cory A. Talbot, Emily S. Cates
Lewis and Roca LLP
40 N. Central Avenue, Phoenix, Arizona 85004
Attorneys for Defendant

DATED: April 13, 2006